

Stanley J. Silverstone  
SEHAM, SEHAM, MELTZ & PETERSEN, LLP  
445 Hamilton Avenue, Suite 1204  
White Plains, New York 10601  
(914) 997-1346  
*Attorneys for Plaintiff*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

DELTA PILOTS ASSOCIATION,  Plaintiff  v.  JOHN DOE,  Defendant.	Civil Action No.: 1:14-cv-00225-AKH  <b>NOTICE OF MOTION TO COMPEL COMPLIANCE WITH SUBPOENA <i>DUCES TECUM</i></b>
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TO: James K. Lobenz, Esq.  
Jim.Lobsenz@alpa.org  
Legal Dept. Air Line Pilots Association International  
535 Herndon Parkway  
PO Box 1169  
Herndon, Virginia 20172-1169  
Tel. (703) 689-4326

**PLEASE TAKE NOTICE** that Plaintiff, the Delta Pilots Association (“DPA”), by and through its undersigned counsel, will move this Court, at the United States Courthouse, 500 Pearl St., New York, New York 10007-1312, at a date and time to be set by the Court, for an order compelling compliance with subpoenas(s) *duces tecum* served on or about May 28, 2014, and June 3, 2014, upon non-party, the Air Line Pilots Association International, and its subordinate body, the Delta Master Executive Council (together “ALPA”), pursuant to Federal Rules of Civil Procedure 45 and 37 and this Court’s order of January 28, 2014, granting Plaintiff leave to take

discovery “upon third parties in order to identify defendant Doe” (Doc. No. 5), based upon Plaintiff’s separately filed supporting memorandum of law, supporting declarations and their attachments, the pleadings, and any argument or evidence adduced in hearing before the Court on this motion.

For supporting grounds, Plaintiff incorporates its memorandum of law. In addition, a proposed order is separately submitted.

Dated: July 3, 2014

By: /s/ Stanley J. Silverstone

Stanley J. Silverstone

ssilverstone@ssmplaw.com

Lucas K. Middlebrook

[lmiddlebrook@ssmplaw.com](mailto:lmiddlebrook@ssmplaw.com)

SEHAM, SEHAM, MELTZ & PETERSEN, LLP

445 Hamilton Avenue, Suite 1204

White Plains, New York 10601

Tel: (914) 997-1346; Fax: (914) 997-7125

-and-

Nicholas Granath, *pro hac vice* (Minn. Lic 198729)

[ngranath@ssmplaw.com](mailto:ngranath@ssmplaw.com)

SEHAM, SEHAM, MELTZ & PETERSEN, LLP

2915 Wayzata Blvd.

Minneapolis, MN 55405

Tel. (612) 341-9080; Fax (612) 341-9079

*Attorneys for Plaintiff*